



STATE OF UTAH
DEPARTMENT OF HEALTH

NORMAN H. BANGERTE, GOVERNOR

SUZANNE DANDY, M.D., M.P.H., EXECUTIVE DIRECTOR

May 31, 1985
533-6146

CERTIFIED MAIL
(RETURN RECEIPT REQUESTED)

RECEIVED

JUN 05 1985

DIVISION OF OIL
GAS & MINING

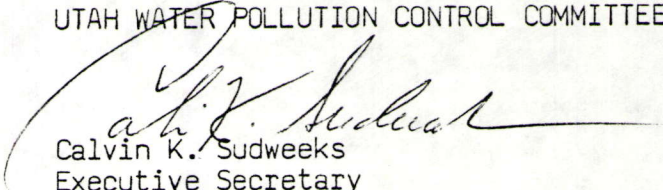
Mr. Bob McAdams
Environmental Supervisor
Texasgulf Chemicals Company
P.O. Box 1208
Moab, Utah 84532

Dear Mr. McAdams:

Transmitted herewith is an order from the Utah Water Pollution Control Committee for your immediate attention.

Sincerely,

UTAH WATER POLLUTION CONTROL COMMITTEE


Calvin K. Sudweeks
Executive Secretary

LBM:tf

Enclosure

cc: Suzanne Dandy, M.D., M.P.H., Executive Director, Department of Health

Kenneth Alkema, Director, Division of Environmental Health

Fred Nelson, Assistant Attorney General

Fred Pehrson, Chief, Permits and Compliance Section

Mike Strieby, EPA

→ Lowell Braxton, Division of Oil, Gas and Mining

Gerald Story, Southeast District Health Department

0447

UTAH WATER POLLUTION CONTROL COMMITTEE

In the matter of Texasgulf
Chemicals Company
Class III Underground
Injection Operation

Notification of Adjustment
to Compliance Schedule and
Order to Submit Information

FINDINGS OF FACT

Texasgulf Chemicals Company operates a Class III underground injection facility in Sections 22-27, 35 and 36, T26S, R20E, Grand County, Utah. In a previous Administrative Order from the Utah Water Pollution Control Committee (WPCC), dated March 14, 1985, a compliance schedule was mandated. Said order included the completion of a study to document the presence or absence of underground sources of drinking water (USDW). The deadline established for the submittal of the final USDW study was contingent upon Bureau of Water Pollution Control (BWPC) staff comments on a draft copy of the study submitted May 1, 1985. Staff comments have been compiled and sent to Texasgulf by letter dated May 23, 1985. The compliance schedule as established is in need of modification.

ORDER

Based upon the foregoing findings and pursuant to the provisions of the Utah Code Annotated, 1953 Section 26-11-7(7), Texasgulf Chemicals Company is hereby ordered to comply with the requirements outlined in UWDR 7.5.3(a)(3) and the previous Administrative Order of March 14, 1985 according to the following schedule:

1. 40 CFR 144.52(a)(6) and (7), 146.10, and UWDR 7.9.3(b)(5) and (7) - Compliance with these requirements is dependent upon the presence of USDWs. Texasgulf shall complete a final study to document the presence or absence of USDWs in the area.

Submittal of final USDW study for the approval of the Executive Secretary of the Water Pollution Control Committee.

Deadline - August 1, 1985

2. 40 CFR 144.52(a)(6) and 146.10 - Plugging and Abandonment Plan. This requirement will be satisfied by submittal of plans to plug and reclaim wells and well heads used in the injection/extraction process. In the case of the existence of any affected USDW within the area, all wells and shafts, regardless of activity status, will be plugged and abandoned according to the manner prescribed by these regulations.

Deadline - August 15, 1985**

3. 40 CFR 144.52(a)(7) - Financial Responsibility Requirements. This requirement will be satisfied by a reclamation bond which will be made payable to the Utah Water Pollution Control Committee. This bond will be posted by a bonding company with a Best's Key Rating Guide minimum rating of A-12.

1) Submittal of total well and shaft reclamation cost estimate for the approval of the Executive Secretary of the Water Pollution Control Committee.

Deadline - August 15, 1985**

2) Submittal of Reclamation Bond to the WPCC.

Deadline - September 15, 1985**

4. UWDR 7.9.3(b)(5) and (7) - Monitoring Well Requirements.
Deadline - to be determined after completion of the USDW study, after which the compliance schedule for these requirements will be issued in a subsequent Administrative Order.

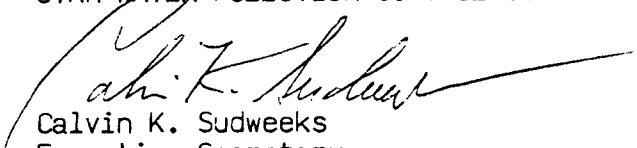
** These deadlines are dependent upon the results of the USDW study. If upon completion of the study these deadlines are found to be inappropriate they will be redetermined and reissued through a subsequent administrative order from the Utah Water Pollution Control Committee.

Be advised that failure to comply with this order could result in penalties outlined in the Utah Code Section 26-11-16 including up to a \$10,000 per day fine. As outlined by Utah Code Section 26-11-12, you have the right to appeal this order by making a written application for a hearing before the Utah Water Pollution Control Committee within 30 days of receipt of this order.

If you have questions, please contact this office at the above number.

Dated: This 31st day of May 1985.

UTAH WATER POLLUTION CONTROL COMMITTEE


Calvin K. Sudweeks
Executive Secretary

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